

**Exhibit 300 (BY2008)**

PART ONE	
OVERVIEW	
1. Date of Submission:	2006-11-07
2. Agency:	015
3. Bureau:	04
4. Investment Name:	BSA Direct E-Filing System (formerly known as Patriot Act Communications System-PACS)
5. UPI:	015-04-01-14-01-1003-00
6. What kind of investment will this be in FY2008?	
Mixed Life Cycle	
7. What was the first budget year this investment was submitted to OMB?	
FY2001 or earlier	
8. Provide a brief summary and justification for this investment, including a brief description of how this closes in part or in whole an identified agency performance gap.	
<p>The BSA E-Filing has two basic components: (1) A system that provides financial institutions the capability to electronically file their bank secrecy act data through a secure internet network which did not exist prior to this investment (2) A secure messaging system that allows FinCEN to communicate and disseminate information such as advisories and reports on the latest trends in money laundering or terrorist financing. The original electronic filing investment was envisioned as a possible solution in reducing the government's cost in the processing of paper and magnetic media of Bank Secrecy Act (BSA) data filed by the financial industry. In addition, the E-Filing investment additionally required the reduction of time to collect and make the data available to law enforcement. The system also helps to reduce the processing costs of paper and magnetic media to the Government. This portion of the system provides FinCEN with a secure messaging system that allows for the distribution of advisories and system updates to the user base. This component also allows participating financial institutions to reply to FinCEN regarding information that may be contained in these advisories or reports. The financial institution participants can communicate directly and securely to FinCEN through the secure messaging system. As of July 2006, there are seven forms that can be filed electronically by financial institutions through this system. Last year FinCEN upgraded the architecture to a more robust, distributed architecture. This resulted in the separation of the front and back end processing and allowed for more security, reliability, availability and better performance. Equipment was replaced due to normal wear and tear. The last phase of the upgraded architecture is the creation of failover-ready disaster recovery system to be completed by end of FY 2006 or beginning of FY 2007. The upgraded architecture is also necessary to improve the performance and stability of the system due to the continued growth in filers and filing volumes. The major enhancement for FY '07 is to improve the up front validation and checking of the batch file structure for adherence to the DCC Magnetic Media Specifications. Additional usability improvements are also planned so that filers receive much more information about errors or problems with their electronic submissions.</p>	
9. Did the Agency's Executive/Investment Committee approve this request?	
yes	
9.a. If "yes," what was the date of this approval?	
2006-08-09	
10. Did the Project Manager review this Exhibit?	
yes	
11. Project Manager Name:	
Project Manager Phone:	
Project Manager Email:	
12. Has the agency developed and/or promoted cost effective, energy-efficient and environmentally sustainable techniques or practices for this project.	

yes	
12.a. Will this investment include electronic assets (including computers)?	
yes	
12.b. Is this investment for new construction or major retrofit of a Federal building or facility? (answer applicable to non-IT assets only)	
no	
12.b.1. If yes, is an ESPC or UESC being used to help fund this investment?	
no	
13. Does this investment support one of the PMA initiatives?	
yes	
If yes, select the initiatives that apply:	
Expanded E-Government	
13.a. Briefly describe how this asset directly supports the identified initiative(s)?	
This investment encourages financial institutions to change from paper filing or magnetic media filing to electronic filing of Bank Secrecy Act reports. It also supports the Treasury Strategic Goal to preserve the integrity of financial systems.	
14. Does this investment support a program assessed using OMB's Program Assessment Rating Tool (PART)?	
yes	
14.a. If yes, does this investment address a weakness found during the PART review?	
no	
14.b. If yes, what is the name of the PART program assessed by OMB's Program Assessment Rating Tool?	
Bank Secrecy Act Data Collection, Retrieval and Sharing	
14.c. If yes, what PART rating did it receive?	
Moderately Effective	
15. Is this investment for information technology (See section 53 for definition)?	
yes	
16. What is the level of the IT Project (per CIO Council's PM Guidance)?	
Level 2	
17. What project management qualifications does the Project Manager have? (per CIO Council's PM Guidance)	
(1) Project manager has been validated as qualified for this investment	
18. Is this investment identified as high risk on the Q4 - FY 2006 agency high risk report (per OMB's high risk memo)?	
yes	
19. Is this a financial management system?	
no	
19.a. If yes, does this investment address a FFMIA compliance area?	
no	
20. What is the percentage breakout for the total FY2008 funding request for the following? (This should total 100%)	
Hardware	9
Software	8
Services	83
21. If this project produces information dissemination products for the public, are these products published to the Internet in conformance with OMB Memorandum 05-04 and included in your agency inventory, schedules and priorities?	
n/a	
22. Contact information of individual responsible for privacy related questions.	
Name	

Phone Number				
Title				
Information System Security Manager				
Email				
23. Are the records produced by this investment appropriately scheduled with the National Archives and Records Administration's approval?				
yes				
<b>SUMMARY OF SPEND</b>				
1. Provide the total estimated life-cycle cost for this investment by completing the following table. All amounts represent budget authority in millions, and are rounded to three decimal places. Federal personnel costs should be included only in the row designated Government FTE Cost, and should be excluded from the amounts shown for Planning, Full Acquisition, and Operation/Maintenance. The total estimated annual cost of the investment is the sum of costs for Planning, Full Acquisition, and Operation/Maintenance. For Federal buildings and facilities, life-cycle costs should include long term energy, environmental, decommissioning, and/or restoration costs. The costs associated with the entire life-cycle of the investment should be included in this report.				
All amounts represent Budget Authority				
(Estimates for BY+1 and beyond are for planning purposes only and do not represent budget decisions)				
	PY-1 & Earlier	PY	CY	
	-2005	2006	2007	
Planning Budgetary Resources	0.000	0.000	0.000	
Acquisition Budgetary Resources	4.322	0.380	0.943	
Maintenance Budgetary Resources	3.548	1.663	1.823	
Government FTE Cost	0.383	0.288	0.597	
# of FTEs	1	2	4	
Note: For the cross-agency investments, this table should include all funding (both managing partner and partner agencies).				
Government FTE Costs should not be included as part of the TOTAL represented.				
2. Will this project require the agency to hire additional FTE's?				
no				
3. If the summary of spending has changed from the FY2007 President's budget request, briefly explain those changes.				
There is no change in program funds. The change from the FY 2007 President's budget request is due to the annualization of late in the year FY 2006 hires and the reassignment of existing FTEs to this investment.				
<b>PERFORMANCE</b>				
In order to successfully address this area of the exhibit 300, performance goals must be provided for the agency and be linked to the annual performance plan. The investment must discuss the agency's mission and strategic goals, and performance measures must be provided. These goals need to map to the gap in the agency's strategic goals and objectives this investment is designed to fill. They are the internal and external performance benefits this investment is expected to deliver to the agency (e.g., improve efficiency by 60 percent, increase citizen participation by 300 percent a year to achieve an overall citizen participation rate of 75 percent by FY 2xxx, etc.). The goals must be clearly measurable investment outcomes, and if applicable, investment outputs. They do not include the completion date of the module, milestones, or investment, or general goals, such as, significant, better, improved that do not have a quantitative or qualitative measure.				
Agencies must use Table 1 below for reporting performance goals and measures for all non-IT investments and for existing IT investments that were initiated prior to FY 2005. The table can be extended to include measures for years beyond FY 2006.				
Table 1				

	Fiscal Year	Strategic Goal(s) Supported	Performance Measure	Actual/baseline (from Previous Year)	Planned Performance Metric (Target)	Performance Metric Results (Actual)
1	2002	Ensure the most effective and efficient use of resources in administering the BSA by completing PACS proof of concept and pilot on time and within budget.	In FY 2002, contractor must complete proof of concept, pilot for testing by selected financial institutions, and report on projected costs of expansion of pilot to production, within 151 days and \$2.3 million dollars.	0%	Share of hours and dollars expended.	100%
2	2003	Ensure the most effective and efficient use of resources in administering the BSA by completing PACS proof of concept and pilot on time and within budget.	Expedite e-filing of BSA forms.	30 days	Number of days it takes to file BSA forms.	7 days
3	2003	Ensure the most effective and efficient use of resources in administering the BSA by completing PACS proof of concept and pilot on time and within budget.	Expand BSA E-Filing usage to allow a greater number of BSA forms to be filed electronically.	0%	Percentage of BSA forms submitted thru PACS.	5%
4	2003	Ensure the most effective and efficient use of resources in administering the BSA by completing PACS proof of concept and pilot on time and within budget.	Increase the number and types of BSA forms available for e-filing.	2 BSA forms	Number of BSA forms available on PACS.	Six BSA forms (300% of goal).
5	2004	Ensure the most effective and efficient use of resources in administering the BSA by completing PACS proof of concept and pilot on time and within budget.	Expand BSA E-Filing usage to allow a greater number of BSA forms to be filed electronically.	5%	Percentage of BSA forms submitted thru PACS.	9% CTRs, 20% SARs
6	2004	Ensure the most effective and efficient use of resources in administering the	Increase the number and types of BSA forms available for e-filing.	6 BSA forms	Number of BSA forms available on PACS.	One form, for a total of 7

		BSA by completing PACS proof of concept and pilot on time and within budget.				
7	2004	Ensure the most effective and efficient use of resources in administering the BSA by completing PACS proof of concept and pilot on time and within budget.	Increase the number of financial institutions filing through PACS	359	Number of financial institutions e-filing	514 financial institutions
8	2005	Provide the technology, education and support needed to accommodate e-filing of 90% of Bank Secrecy Act reports by FY 2009. Preserve Integrity of Financial Systems	Expand BSA E-Filing usage to allow a greater number of BSA forms to be filed electronically.	25%	Percentage of BSA forms submitted electronically	35%
9	2005	Provide the technology, education and support needed to accommodate e-filing of 90% of Bank Secrecy Act reports by FY 2009. Preserve Integrity of Financial Systems	Increase the number of financial institutions e-filing.	450	Number of financial institutions e-filing	900
10	2006	Provide the technology, education and support needed to accommodate e-filing of 90% of Bank Secrecy Act reports by FY 2009. Preserve Integrity of Financial Systems	Expand BSA E-Filing usage to allow a greater number of BSA forms to be filed electronically.	35%	Percentage of BSA forms submitted electronically	47% as of June 2006
11	2006	Provide the technology, education and support needed to accommodate e-filing of 90% of Bank Secrecy Act reports by FY 2009. Preserve Integrity of Financial Systems	Increase the number of financial institutions e-filing.	900	Number of financial institutions e-filing	1300 as of June 2006
12	2007	Provide the technology, education and support needed to accommodate e-filing of 90% of Bank Secrecy Act	Expand BSA E-Filing usage to allow a greater number of BSA forms to be filed electronically.	50%	Percentage of BSA forms submitted electronically	-

		reports by FY 2009. Preserve Integrity of Financial Systems				
13	2007	Provide the technology, education and support needed to accommodate e-filing of 90% of Bank Secrecy Act reports by FY 2009. Preserve Integrity of Financial Systems	Increase the number of financial institutions e-filing.	1500	Number of financial institutions e-filing	-
18	2005	Provide the technology, education and support needed to accommodate e-filing of 90% of Bank Secrecy Act reports by FY 2009. Preserve Integrity of Financial Systems	Increase the number of forms e-filed	4 million forms e-filed	Number of forms e-filed	4 million forms e-filed
19	2005	Provide the technology, education and support needed to accommodate e-filing of 90% of Bank Secrecy Act reports by FY 2009. Preserve Integrity of Financial Systems	Reduce the cost of e-filing	\$.64 per e-form	Cost per form	\$.32 per e-form
20	2006	Provide the technology, education and support needed to accommodate e-filing of 90% of Bank Secrecy Act reports by FY 2009. Preserve Integrity of Financial Systems	Increase the number of forms e-filed	4 million forms e-filed	Number of forms e-filed	5.7 million forms e-filed as of June 2006
21	2006	Provide the technology, education and support needed to accommodate e-filing of 90% of Bank Secrecy Act reports by FY 2009. Preserve Integrity of Financial Systems	Reduce the cost of e-filing	\$.32 per e-form	Cost per form	\$.32 per e-form as of June 2006
22	2007	Provide the technology, education and support needed to accommodate e-filing of 90% of Bank Secrecy Act reports by FY 2009. Preserve Integrity of Financial Systems	Increase the number of forms e-filed	6 million forms e-filed	Number of forms e-filed	

		Financial Systems				
23	2007	Provide the technology, education and support needed to accommodate e-filing of 90% of Bank Secrecy Act reports by FY 2009. Preserve Integrity of Financial Systems	Reduce the cost of e-filing	\$ .30	Cost per form	

All new IT investments initiated for FY 2005 and beyond must use Table 2 and are required to use the FEA Performance Reference Model (PRM). Please use Table 2 and the PRM to identify the performance information pertaining to this major IT investment. Map all Measurement Indicators to the corresponding "Measurement Area" and "Measurement Grouping" identified in the PRM. There should be at least one Measurement Indicator for at least four different Measurement Areas (for each fiscal year). The PRM is available at [www.egov.gov](http://www.egov.gov).

Table 2

	Fiscal Year	Measurement Area	Measurement Grouping	Measurement Indicator	Baseline	Planned Improvement to the Baseline	Actual Results
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## EA

In order to successfully address this area of the business case and capital asset plan you must ensure the investment is included in the agency's EA and Capital Planning and Investment Control (CPIC) process, and is mapped to and supports the FEA. You must also ensure the business case demonstrates the relationship between the investment and the business, performance, data, services, application, and technology layers of the agency's EA.

1. Is this investment included in your agency's target enterprise architecture?

yes

1.a. If no, please explain why?

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2. Is this investment included in the agency's EA Transition Strategy?

yes

2.a. If yes, provide the investment name as identified in the Transition Strategy provided in the agency's most recent annual EA Assessment.

BSA Direct E-Filing System

3. Identify the service components funded by this major IT investment (e.g., knowledge management, content management, customer relationship management, etc.). Provide this information in the format of the following table. For detailed guidance regarding components, please refer to <http://www.whitehouse.gov/omb/egov/>.

Component: Use existing SRM Components or identify as NEW. A NEW component is one not already identified as a service component in the FEA SRM.

Reused Name and UPI: A reused component is one being funded by another investment, but being used by this investment. Rather than answer yes or no, identify the reused service component funded by the other investment and identify the other investment using the Unique Project Identifier (UPI) code from the OMB Ex 300 or Ex 53 submission.

Internal or External Reuse?: Internal reuse is within an agency. For example, one agency within a department is reusing a service component provided by another agency within the same department. External reuse is one agency within a department reusing a service component provided by another agency in another department. A good example of this is an E-Gov initiative service being reused by multiple organizations across the federal government.

Funding Percentage: Please provide the percentage of the BY requested funding amount used for each service component listed in the table. If external, provide the funding level transferred to another agency to pay for the service.

	Agency Component	Agency Component Description	Service Type	Component	Reused Component	Reused UPI	Internal or	Funding %
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	Name				Name		External Reuse?	
1	BSA Forms	The system includes the BSA forms for BSA data capture, formatting, and validation	Content Management	Content Authoring			No Reuse	5
2	BSA Forms	The system includes the BSA forms for BSA data capture, formatting, and validation	Content Management	Content Authoring			No Reuse	5
3	File transfer	The system transfers the data to a data repository that can be accessed by federal agencies and law enforcement	Knowledge Management	Knowledge Distribution and Delivery			No Reuse	1
8	SU Role	The system includes a super user role that allows management/assignment of privileges of subordinate users and restricts transactions by filer and filing type.	Customer Relationship Management	NEW			No Reuse	1
10	Online Help	Users can obtain online help by clicking on areas they have questions about and clicking Help.	Customer Initiated Assistance	Online Help			No Reuse	1
11	User Documentation	The system includes comprehensive online user manuals and instructions.	Customer Initiated Assistance	Online Tutorials			No Reuse	1
13	Online Training	The system includes online tutorials, user manuals	Content Management	Content Authoring			No Reuse	1
14	Web Hosting	The system includes web hosting and web hosting processes.	Document Management	Document Review and Approval			No Reuse	20
15	Vetting Requests	Users can initiate PACS enrollment online	Customer Initiated Assistance	Self-Service			No Reuse	10
16	Alerts	The system contains an Alerts and Secure Email component for communication with the users.	Customer Preferences	Alerts and Notifications			No Reuse	1
17	User Accounts	Each user has a profile that is used for identification and authorization as well as contact information to communicate with the user.	Customer Relationship Management	Customer / Account Management			No Reuse	5
18	Secure Messaging	The system includes a Secure Email component by which users can provide feedback and a Help Desk as well..	Customer Relationship Management	Customer Feedback			No Reuse	1



19	Filers	The system receives and processes BSA filings from multiple sources	Development and Integration	Data Integration			No Reuse	5
20	Test Bed	The system includes a test bed so each change can be tested before implementation	Development and Integration	Instrumentation and Testing			No Reuse	10
21	Legacy Integration	The system includes integration with mainframe environments.	Development and Integration	Legacy Integration			No Reuse	10
22	SDLC	The software development environment includes configuration management, development of APIs, testing, tools such as Rational for requirements, analysis and testing.	Development and Integration	Software Development			No Reuse	12

4. To demonstrate how this major IT investment aligns with the FEA Technical Reference Model (TRM), please list the Service Areas, Categories, Standards, and Service Specifications supporting this IT investment.

FEA SRM Component: Service Components identified in the previous question should be entered in this column. Please enter multiple rows for FEA SRM Components supported by multiple TRM Service Specifications.

Service Specification: In the Service Specification field, Agencies should provide information on the specified technical standard or vendor product mapped to the FEA TRM Service Standard, including model or version numbers, as appropriate.

	SRM Component	Service Area	Service Category	Service Standard	Service Specification (i.e., vendor and product name)
1	Task Management	Service Access and Delivery	Access Channels	Collaboration / Communications	Northrop Grumman In Flow Suite
6	Knowledge Distribution and Delivery	Service Access and Delivery	Service Requirements	Legislative / Compliance	Section 508 compliance tools
7	Content Publishing and Delivery	Service Access and Delivery	Service Requirements	Legislative / Compliance	Section 508 compliance tools
8	Software Development	Service Platform and Infrastructure	Support Platforms	Platform Independent	J2EE
9	Self-Service	Service Platform and Infrastructure	Delivery Servers	Web Servers	Web Logic
10	Software Development	Service Platform and Infrastructure	Software Engineering	Integrated Development Environment	Web Sphere
11	Data Mart	Service Platform and Infrastructure	Database / Storage	Database	Oracle
12	Software Development	Service Platform and Infrastructure	Software Engineering	Software Configuration Management	Rational Suite Clear Quest
13	Software Development	Service Platform and Infrastructure	Software Engineering	Software Configuration Management	Rational Suite ClearQuest
14	Software Development	Service Platform and Infrastructure	Software Engineering	Software Configuration Management	Rational Suite Deployment tracking

15	Software Development	Service Platform and Infrastructure	Software Engineering	Software Configuration Management	Rational Suite Clearquest
16	Software Development	Service Platform and Infrastructure	Software Engineering	Test Management	Rationale Suite Testing
17	Software Development	Service Platform and Infrastructure	Software Engineering	Test Management	Rationale Suite Installation Tools
18	Software Development	Service Platform and Infrastructure	Software Engineering	Modeling	Rationale Suite Rational Rose
22	Computers / Automation Management	Service Platform and Infrastructure	Hardware / Infrastructure	Servers / Computers	Enterprise Server
26	Content Authoring	Component Framework	Presentation / Interface	Static Display	HTML
27	Software Development	Component Framework	Business Logic	Platform Independent	JDK 1.3.1
29	Software Development	Component Framework	Data Management	Database Connectivity	XML
30	Software Development	Service Interface and Integration	Interoperability	Data Types / Validation	XML, DTD
31	Software Development	Service Interface and Integration	Interoperability	Data Format / Classification	XML
32	Software Development	Service Interface and Integration	Interface	Service Description / Interface	API
34	Content Publishing and Delivery	Service Access and Delivery	Service Requirements	Hosting	Northrop Grumman/AT&T
35	Software Development	Service Platform and Infrastructure	Software Engineering	Test Management	Rationale Suite

5. Will the application leverage existing components and/or applications across the Government (i.e., FirstGov, Pay.Gov, etc)?

yes

5.a. If yes, please describe.

The BSA E-Filing project team will perform analyses to identify applications (e.g. digital asset management, security management, etc.), technologies and standards in the FEA SRM/TRM to leverage the best fit existing services, components, and capabilities across the Government. In addition to that, E-Filing will become a member of the GSA sponsored Federation in FY 08.

6. Does this investment provide the public with access to a government automated information system?

yes

6.a. If yes, does customer access require specific software (e.g., a specific web browser version)?

yes

6.a.1. If yes, provide the specific product name(s) and version number(s) of the required software and the date when the public will be able to access this investment by any software (i.e. to ensure equitable and timely access of government information and services).

Not a specific web browser, but the filers must download (for free) a copy of the PureEdge viewer (ICS Viewer 5.1) in order to fill out single Bank Secrecy Act forms which they are able to do through a link on the public web page for the BSA E-Filing system. We are investigating the use of Adobe Acrobat reader in the future, because this is more standard.

## PART TWO

### RISK

You should perform a risk assessment during the early planning and initial concept phase of the investment's life-cycle, develop a risk-adjusted life-cycle cost estimate and a plan to eliminate, mitigate or manage risk, and be actively managing risk throughout the investment's life-cycle.

Answer the following questions to describe how you are managing investment risks.
1. Does the investment have a Risk Management Plan?
yes
1.a. If yes, what is the date of the plan?
2006-08-18
1.b. Has the Risk Management Plan been significantly changed since last year's submission to OMB?
no
3. Briefly describe how investment risks are reflected in the life cycle cost estimate and investment schedule: (O&M investments do NOT need to answer.)
At project inception, a projection of the costs over a 10 year period had been done. The govt. project manager is working with FinCEN Budget to project future costs and any risk of cost overruns. The contractor is expected to provide accurate cost estimations for any proposed enhancement or O&M increases. Independent government estimates must also be done.
<b>COST &amp; SCHEDULE</b>
Does the earned value management system meet the criteria in ANSI/EIA Standard 748?
yes
2.a. What is the Planned Value (PV)?
1.395
2.b. What is the Earned Value (EV)?
1.170
2.c. What is the actual cost of work performed (AC)?
1.361
What costs are included in the reported Cost/Schedule Performance information?
Contractor and Government
2.e. As of date:
2006-12-31
3. What is the calculated Schedule Performance Index (SPI= EV/PV)?
0.84
4. What is the schedule variance (SV = EV-PV)?
-0.225
5. What is the calculated Cost Performance Index (CPI = EV/AC)?
0.86
6. What is the cost variance (CV = EV-AC)?
-0.191
7. Is the CV or SV greater than 10%?
yes
7.a. If yes, was it the CV or SV or both?
Both
7.b. If yes, explain the variance.
The cost variance is currently ok. We decided to transition to user ID, password and PIN because our users were complaining about the difficult process for obtaining certificates and the technical problems downloading and using certificates. This was reflected in an OIG report released in early '05 which recommended that we improve usability for our users vis a vis the certificates. In order to transition to User ID, Password and PIN we have had to modify the system. This has required that we take funding from other areas to cover this.
7.c. If yes, what corrective actions are being taken?
The project budget was affected by the loss of the GSA ACES digital certificate provider, AT&T, an unplanned event. The

priority was to move to User ID/Password/PIN as quickly as possible and then get back on target once that transition was completed. The transition adversely affected the project as funds were diverted from other tasks to cover this necessary system change. By year-end, the project should be back on target. Completion of this task does not adversely impact our long term performance goals and PART measures will be met. The schedule includes FinCEN participation in User Group conferences and meetings for Outreach purposes.

*7.d. What is most current Estimate at Completion?*

*8. Have any significant changes been made to the baseline during the past fiscal year?*

no